REMARKS

Claims 1 - 6 and 8-16 are now pending in the application. The Examiner is respectfully requested to reconsider and withdraw the rejection(s) in view of the amendments and remarks contained herein.

REJECTION UNDER 35 U.S.C. § 103

Claims 1 – 6, 10 – 11, and 13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Drzaic (U.S. Pat. No. 6,518,949) in view of DiSanto (U.S. Pat. No. 5,053,763). This rejection is respectfully traversed.

Claim 1 has been amended to call for an active-matrix array of switching elements comprised of thin-film transistors, wherein the switching elements are respectively connected with the pixel electrodes and apply a voltage to the pixel electrodes not greater than 20V. This subject matter is supported at page 6, line 5 to page 7, line 2. Applying a voltage under 20V is advantageous when thin-film transistors are used because a higher voltage disrupts a reliability of the thin-film transistors when doing a switching operation. Neither Drzaic, DiSanto, nor any combination thereof teaches, suggests, or provides motivation to utilize an electrophoretic display with thin film transistors that are connected to the pixel electrodes and apply a voltage to the pixel electrodes not greater than 20V.

Further, DiSanto does not teach transistors at all. As such, DiSanto teaches a passive type display device. Since DiSanto teaches a passive type device, there is no motivation for the inventors of the claimed invention, which is an active type display device, to utilize the teachings of DiSanto to arrive at the claimed invention. That is,

there is no motivation to develop an active type display device with thin film transistors that apply a voltage to pixel electrodes not greater than 20V to enable a display content that can be rewritten in such a manner that the display content is erased at once from the entire area corresponding to the display surface and is then rewritten with a new one, as claimed.

Further, DiSanto teaches a voltage of 200V is applied to its electrodes. This value is far larger than that of the claimed invention. Since the cited references, both singularly and in combination, fail to teach such a configuration, the claimed invention would not have been obvious.

Claims 7 and 8 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Drzaic (U.S. Patent No. 6,528,949) in view of DiSanto et al. (U.S. Patent No. 5,053,763) and further in view of Comiskey et al. (U.S. Patent No. 6,535,197). This rejection is respectfully traversed.

Claim 7 has been cancelled and claim 8 is dependent on claim 1, addressed above. Claim 8 is not obvious for at least the same reasons.

Claim 12 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Drzaic in view of DiSanto et al. and further in view of Hasegawa et al. (U.S. Patent No. 6,373,461). This rejection is respectfully traversed.

Claim 12 is dependent on claim 10, which is dependent on claim 1, addressed above. Claim 12 is not obvious for at least the same reasons.

Claims 14 and 15 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Drzaic in view of Hasegawa et al. (U.S. Patent No. 6,373,461). This rejection is respectfully traversed.

Statement of Common Ownership

Applicant respectfully asserts that present application, Serial No. 09/941,541, and Patent No. 6,373,461 to Hasegawa et al were, at the time the invention of the present application, Serial No. 09/941,541 was made, owned by Seiko Epson Corporation.

Since the present application and Patent No. 6,373,461 were commonly owned by Seiko Epson Corporation at the time the present invention was made, and Patent No. 6,373,461 only qualifies as prior art under 35 U.S.C. § 102(e), Patent No. 6,373,461 is disqualified as prior art. As such, Applicant respectfully requests that the outstanding rejection in view of Drzaic and Hasegawa be withdrawn.

Accordingly, reconsideration and withdrawal of this rejection is respectfully requested.

NEW CLAIM

New claim 16 has been added. New claim 16 calls for a plurality of integrated circuits including data drivers and scan drivers for driving the switching elements. This subject matter is supported on page 11, lines 17-24. Such a configuration provides an

electrophoretic display that has a reduced power consumption. This reduction in power consumption is described on page 12, lines 22-25 and page 13, lines 1-2:

> "As described above, the data drivers 51, 52 and the scan drivers 53, 54 operate in accordance with the prescribed decoding system. Therefore, the pixel array portion 39 is merely required to control the electrophoretic ink layer 115 in such a manner that the display content is rewritten with respect to the pixel for which display data is to be updated. This guarantees reduction of power consumption by the electrophoretic display when it is used in an electronic book."

Neither Drzaic nor DiSanto teach, suggestion, or provide motivation arrive at an electrophorectic display that has a plurality of integrated circuits including data drivers and scan drivers for driving the switching elements. Since neither Drzaic nor DiSanto teach such an electrophoretic display, the claimed invention would not have been obvious.

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

Dated: March 24, 2004

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